



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*United States Courthouse  
300 Quarropas Street  
White Plains, New York 10601*

October 15, 2021

**BY ECF**

The Honorable Cathy Seibel  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

Re: **United States v. Virginia Blanco,**  
S4 16 Cr. 408 (CS)

Dear Judge Seibel:

The Government respectfully submits this letter to request an extension to the Court's filing deadline for the Government's response to the defendant's petition under 28 U.S.C. § 2255.

On October 4, 2021, the defendant filed an amended motion to vacate her conviction under 28 U.S.C. § 2255. (Dkt. No. 200). On the following day, the Court set a briefing schedule, ordering the Government to respond to the defendant's petition by November 19, 2021, and giving the defendant until January 3, 2022 to reply. On October 15, 2021, the Court granted the defendant's request to submit additional exhibits in support of her petition, noting that the "Government has not yet responded to the Petition and still has ample time to do so." (Dkt. No. 203). Both the undersigned Assistant United States Attorneys—who were trial counsel in the above captioned matter—are set to begin a trial on Monday, October 18, 2021 before the Honorable Nelson S. Roman, which is expected to last at least four weeks. Accordingly, the Government respectfully requests a two-week extension to file its response to the defendant's petition.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: /s/  
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cc: Defendant Virginia Blanco (by mail)